

City of Everett
NPDES II Annual Report Form Comments

Page 2, Part 1: One of the goals of the report is stated in the second paragraph to be “evaluate program for continuous improvement”. What does “continuous improvement” mean? Does this mean continuous improvement in the water quality of our receiving waters? Does it mean permittees must continually improve the cost effectiveness of our programs? The preliminary draft permit does not require permittees to show continuous improvement. Therefore, the goal to evaluate our programs for continuous improvement should be deleted.

Page 2, Part 1: Reporting requirements are cited in 40 CFR 122.34(g)(c), not 40 CFR 122.34(g)(c).

Page 3, section 1A: The reference to phase I permit # should be changed to the Western Washington phase II general permit.

Page 3 through 6: Compliance with the Clean Water Act and the NPDES permit should not be dependent upon the cost of developing and/or implementing the permit. Nor is the implementation cost needed to meet the four goals of the annual report articulated on page 2. Therefore, tables 1 and 2 should be deleted.

Page 7, Section 2: Again, compliance with the Clean Water Act and the NPDES permit should not be dependent upon the cost of developing and/or implementing the permit. Therefore, the first question in section 2 should be deleted.

Page 12, follow-up training: The response to the question about completion of follow up training includes a check box for N/A if this is the first year of the permit. Check boxes for N/A should be provided for all questions dealing with actions not required until after the first year of the permit. For example, the question about establishing a citizen complaint telephone number should include a N/A check box for the first two years of the permit. Having N/A boxes would prevent the inappropriate appearance of permit violations in cases where the deadline for the permit requirement has not passed.

Pages 13 through 17, compliance with S.7.C.4: All of the requirements of S.7.C.4 apply only to development sites greater than 1 acre, yet only a few of the questions and check boxes dealing with S.7.C.4 refer to the one acre threshold. All of the questions and check boxes dealing with S.7.C.4 should refer to the one-acre threshold.

Page 15, compliance w/ S.7.C.4.b.i: The yes box for this question asks for the % of site plans that have been reviewed. The S.7.C.4.b.i requirement is to review all site plans for projects greater than one acre. Therefore, the % of site plans reviewed is irrelevant and should not be used to judge permit compliance.

Page 15, compliance w/ S.7.C.4.b.ii: Similarly, the yes box for this question asks for the % of development sites near sediment/erosion sensitive features that were inspected. . The S.7.C.4.b.ii is to inspect all developments near sediment/erosion sensitive features. Therefore, the % of developments reviewed is irrelevant and should not be used to judge permit compliance.

Pages 17 through 20, S7.C.5: Again, N/A boxes should be provided for all questions that apply to requirements with deadlines beyond the first year of the permit.